

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

NELITZA TORRES ORTIZ

DEBTOR

CASE NO. 19-06358/MCF

CHAPTER 13

**DEBTOR'S REPLY TO *MOTION TO DISMISS*, DOCKET NO. 78  
FILED BY ORIENTAL BANK**

**TO THE HONORABLE COURT:**

**COMES NOW, NELITZA TORRES ORTIZ**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Oriental Bank ("Oriental") filed a *Motion to Dismiss*, Docket No. 78, stating that the Debtor is in arrears in the direct post-petition mortgage loan payments to said creditor, owing three (3) monthly payments or the total of \$2,985.85. *Motion to Dismiss*, Docket No. 78, at paragraph 3.

2. The Debtor hereby respectfully submits that on June 22, 2023, she made one (1) payment in the sum of \$2,985.85, to Oriental in order to cure any and all post-petition arrears owed to said secured creditor.

3. Based on the above stated, the Debtor respectfully submits that she is currently up-to-date with the direct post-petition payments to Oriental and requests that the Court deny Oriental motion to dismiss, Docket No. 78.

**WHEREFORE**, the Debtor respectfully requests this Honorable Court deny *Motion to Dismiss*, Docket No. 78, filed by Oriental, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee Jose Ramon Carrion Morales Esq.; Jose F. Cardona Jimenez Esq., *Cardona Jimenez Law Office*, Counsel for Oriental Bank; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: the Debtor, Nelitza Torres Ortiz, 5 Munoz Rivera Street Cidra PR 00739, in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 22<sup>nd</sup> day of June, 2023.

**/s/Roberto Figueroa Carrasquillo**

USDC 203614

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## Notification of Electronic Transaction

Recibidos



**no-reply** 12:24 p.m.

para yo ▾



([nelitza.torres07@gmail.com](mailto:nelitza.torres07@gmail.com))

This email is to inform you that Oriental Puerto Rico has electronically processed a single ACH debit transaction to your checking/savings account in the amount of \$2,985.85 from account ending with 3605 per your authorization on 6/22/2023 11:22:44 AM CST. The description Oriental Puerto Rico has provided for this transaction is as follows: This transaction will be debited from your account on Thursday, June 22, 2023 and will appear on your bank statement under the electronic transaction section.

If this transaction is in error or is a fraudulent transaction please contact Oriental Puerto Rico at 787-777-7117 if you have any questions or concerns. Thank you for your payment.

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